



October 24, 2022

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Rajinder Sahota
Deputy Executive Officer, Climate Change and Research
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Comments on the Recirculated Draft Environmental Analysis for the Draft 2022 Scoping Plan Update

Dear Ms. Sahota:

Tejon Ranch Company, on behalf of itself and its subsidiary/affiliated entities Tejon Ranchcorp and Centennial Founders, LLC (collectively, the "Tejon Ranch"), appreciates the opportunity to comment on the **Recirculated Draft Environmental Analysis Scoping Plan Update** (the "Plan") released on September 9, 2022.

Tejon Ranch is the owner of the largest single expanse of private property in California and has a demonstrated 175-year legacy of sustainable land stewardship in Kern and Los Angeles counties. In 2008, Tejon Ranch voluntarily entered into California's largest private land conservation agreement that conserves 240,000 acres (90 percent) of Tejon Ranch and allows for sustainable development of 10 percent of Tejon Ranch alongside state transportation corridors and established job centers.¹ Our development activities use the most suitable lands to meet the housing, employment, open space and lifestyle needs of current and future generations of Californians.

Tejon Ranch seeks to reaffirm our position and restate our concerns specific to CARB's Draft Scoping Plan. We hereby incorporate by this reference our previous "Comments on the Draft 2022 Climate Change Scoping Plan submitted to the California Air Resources Board (CARB)" on June 23, 2022.

1. Natural and Working Lands. CARB proposes to rule out development on 90 percent of California's land by labelling it as "natural and working lands." The Plan seeks to avoid conversion of all existing forests, shrublands and grasslands, as well as a 50 percent reduction from current development conversion levels in "deserts and sparsely vegetated landscapes." Such a sweeping designation as natural and working lands suggests a dismissal of local jurisdictions' land use authority, imposed at a time when local jurisdictions should be exercising their approval powers more urgently to address the housing shortage and home affordability crisis experienced by all

¹ ["Conservation on a staggering scale' at Tejon" San Francisco Chronicle, May 9, 2008.](#)

Californians. CARB's CEQA proposals strongly disfavor all but relatively high-density (e.g., at least 20 units/acre), central urban, mass transit-oriented development and re-development. The effect is to disfavor, prejudice, and overly burden all other types of development (lower density communities and redevelopment projects, suburban development and hinders the development of sustainable master planned communities designed to help meet the rising housing production needs, including affordable housing, of Californians. Candidly, CARB's promotion of infill-only is misguided, unpractical and non-workable.

2. Inconsistency with Previously Approved Plans and Projects and the Transfer of Land Use Control from Cities and Counties to Regional Transportation Agencies. The Plan codifies regional plans into "land use plans and regulations at the local level" and therefore threatens to hinder sustainable growth and much needed housing production in Southern California and beyond. State law has intentionally and historically granted land use authorities with local governments who best understand and are most responsive to the needs of their constituents. CARB should respect the alignment of land use, housing, transportation, and conservation planning in existing and already adopted regional plans, such as regional transportation plans ("RTP") or sustainable communities strategies ("SCS") and regional housing needs assessments ("RHNA") local plans (e.g., general plans, zoning, and local transportation plans). The Los Angeles County General Plan 2035 (General Plan") was adopted with principles that emphasize sustainability. The Antelope Valley Area Plan (the "AVAP Plan"), adopted as a community-based plan for the Antelope Valley area and as a component of the General Plan, relies on a Rural Preservation Strategy to meet the goals and objectives of the General Plan, by balancing priorities for environmental conservation and preservation against the need for development. As part of the AVAP Plan's Rural Preservation Strategy, three Economic Opportunity Areas ("EOAs") were adopted. These EOAs, areas where major infrastructure projects are being planned by state and regional agencies to support housing and economic development, reflect the County's priority areas for growth and development within the Antelope Valley. Tejon Ranch has a legacy of stewardship of our land that pre-dates statehood, and is committed to land conservation and the sustainable development of large-scale mixed use communities – including achievement of net-zero GHG for Centennial – that meet the rising housing, employment and lifestyle needs of Californians.
3. Exacerbates California's housing shortage and affordability crisis. The Plan prioritizes affordable housing and social equity goals, however it fails to acknowledge the additional cost burden on housing development by increasing GHG and VMT mitigation measure costs and thus housing costs. Amid skyrocketing home prices and inflation that has reached a 40-year high, we urge CARB to realistically pursue statewide policies that will help ease California's housing crisis and work to lower barriers to entry on home ownership at all levels of affordability. CARB continues to champion land use policies aimed at radically reducing per capita vehicle miles traveled ("VMT") specifically, CARB aims to decrease individual mobility by nearly one-third, by mandating sweeping and concentrated changes in our urban form, effectively ruling out all other kinds of development and redevelopment. Since 2010 (pursuant to Senate Bill 375 enacted in 2008), CARB has been promoting land use scenarios aimed at reducing per capita VMT, but no meaningful VMT reductions have ever been realized. An unwavering reliance on VMT cutting means that CARB is

offloading California's citizens out of state. Additionally, jobs are transitioning, are becoming automated, and employers are offering work from home. The Plan also states that state funding should be "eliminated" for "infrastructure, development, that fall outside of infill areas that do not demonstrate clear alignment with state guidelines on VMT, climate, and equity outcomes." This approach ironically punishes Californians, as the plan does not take into account existing laws and policies currently advancing mobility efficiency and capacity. Prior to VMT action, CARB should assess the lifestyle changes and infrastructure investments required before it enacts a VMT mandate. Without the infrastructure investment, lives of hardworking Californians, many from disadvantaged communities, will be further harmed. For many families, homeownership and home equity is often the gateway to creating intergenerational wealth for middle- and lower-income families. Misguided policies that fail to consider the broader implications are detrimental to providing opportunity for those families to build wealth and are contributing factors to the wealth and equity gap.

4. Net-Zero GHG Communities. In Appendix D, the Plan specifically recognizes the importance of Tejon Ranch's Centennial Master Plan as a net-zero GHG project² and further recognizes the model for GHG mitigation prioritization as defined in the Climate Resolve agreement. However, the Plan does not address other relevant prohibitory Plan provisions (e.g., grassland and "sparsely vegetated" land use restrictions) or VMT. To generate delivery of net-zero GHG projects, the Plan should unambiguously include a grandfathering provision for Centennial and other previously approved and lawfully entitled projects that comply with existing general plan housing elements and/or have vested development rights but still require additional agency permit approvals for complete buildout. Without recognition of already approved net-zero GHG projects, the Plan jeopardizes the actual delivery of the very types of projects the Plan promotes.

Over the last two decades, Tejon Ranch has undertaken the planning, entitlement, and permitting efforts of four master-planned communities on the 10 percent of developable lands of Tejon Ranch. Tejon Ranch's commercial development and residential housing projects are long-considered and sustainable communities. Tejon Ranch's projects are appropriately balanced and will contribute to resolving California's severe housing crisis by building nearly 35,000 energy-efficient and climate resilient homes, and 3,480 affordable housing units that help achieve Governor Newsom's housing vision of a *California for All*.

We appreciate being able to participate in the Scoping Plan process and having our comments taken into consideration.

Thank you,


Marc W. Hardy (Oct 24, 2022 17:01 PDT)

Marc W. Hardy
Vice President, General Counsel

² ["Environmental group and Tejon Ranch agree on plan to build 19,300 zero-emission homes" Los Angeles Times, December 1, 2021.](#)

Comments on Recirculated Draft Environmental Analysis for the Draft 2022 Scoping Plan Update

Final Audit Report

2022-10-25

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